

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

In re:	)	Chapter 7
	)	
NATE LYNN SHREEVES,	)	Case No. 21-81070
	)	
Debtor.	)	Hon. Thomas M. Lynch
	)	
	)	Hearing: October 13, 2021 at 11:00 A.M.

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on **Wednesday, October 13, 2021, at 11:00 a.m.**, we will appear before the Honorable Judge Thomas M. Lynch, or any judge sitting in that judge's place, and present the **MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE COUNSEL** (the "**Motion**"), a copy of which is attached.

**This Motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the Motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com>. Then enter the meeting ID.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

**Meeting ID and password.** The meeting ID for this hearing is 160 291 5226 and the password is 852255. The meeting ID and password can be found on Judge Lynch's webpage on the court's website, <https://www.ilnb.uscourts.gov/content/judge-thomas-m-lynch>.

**If you object to this Motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the Motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the Motion in advance without a hearing.

Dated: September 29, 2021

Respectfully submitted,

**JENNER & BLOCK LLP**

By: /s/ Ronald R. Peterson

Ronald R. Peterson (2188473)  
Landon S. Raiford (6297473)  
William A. Williams (6321738)  
Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
(312) 222-9350

*Withdrawing Counsel of Record for The LCF  
Group*

**THE LCF GROUP**

By: /s/ James E. Stevens

James E. Stevens  
Barrick, Switzer, Long, Balsey & Van Evera, LLP  
6833 Stalter Drive  
Rockford, IL 61108  
(815) 962-6611

*Counsel for The LCF Group*

**CERTIFICATE OF SERVICE**

I, Ronald Peterson, certify that on September 29, 2021, I caused a copy of the **Notice of Motion** and **Motion For Leave To Withdraw And Substitute Counsel** to be served upon the parties listed on the below Service List that are registered with the Court's CM/ECF system, by electronic notification of the filing.

/s/ Ronald R. Peterson

**SERVICE LIST**

**VIA ECF Notification:**

- **John P Dickson** john@dicksonlawgroup.com
- **Brian Hart** brian@rockfordtrustee.com, I009@ecfbis.com
- **Patrick S Layng** USTPRegion11.MD.ECF@usdoj.gov

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In re:	)	Chapter 7
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NATE LYNN SHREEVES,	)	Case No. 21-81070
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Debtor.	)	Hon. Thomas M. Lynch
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	)	Hearing: October 13, 2021 at 11:00 A.M.

**MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE COUNSEL**

Jenner & Block LLP (“Jenner & Block”) and The LCF Group (“LCF”) hereby move for entry of an Order (a) granting Ronald R. Peterson, Landon S. Raiford, and William A. Williams of Jenner & Block leave to withdraw as LCF’s counsel of record in the above-captioned chapter 7 case; and (b) granting LCF leave to substitute James E. Stevens of Barrick, Switzer, Long, Balsey & Van Evera, LLP as its new counsel of record. In support thereof, they respectfully state:

1. On August 25, 2021, Nate Lynn Shreeves (the “Debtor”) filed a voluntary petition for relief under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, commencing the above-captioned chapter 7 case (the “Chapter 7 Case”).

2. On September 16, 2021, the Debtor filed a *Motion for Entry of an Order Enforcing the Automatic Stay and for Contempt* [Dkt. 12] (the “Stay Violation Motion”) in which the Debtor alleged that LCF willfully violated the automatic stay in the Chapter 7 Case.

3. Thereafter, LCF asked Jenner & Block to represent it in connection with the Stay Violation Motion.

4. On September 20, 2021, to ensure LCF provided notice of its objection to the Stay Violation Motion no later than two business days before the September 22, 2021 presentment date (*see Third Amended General Order No. 20-03*, ¶ 7(b)), Jenner & Block attorneys Ronald R.

Peterson, Landon S. Raiford, and William A. Williams filed appearances for themselves in the Chapter 7 Case as counsel for LCF [Dkt. 14, 15, 16], along with a *Notice of Objection* [Dkt. 17] requesting that the Court call the Stay Violation Motion at the September 22 hearing.

5. LCF has since decided that it no longer wishes to engage Jenner & Block as its counsel for this matter and has instead engaged James E. Stevens of Barrick, Switzer, Long, Balsey & Van Evera, LLP.

6. By this Motion, pursuant to Local Rule 2091-1, Jenner & Block and LCF request that the Court enter an Order granting LCF leave to substitute Mr. Stevens as its counsel of record in the Chapter 7 Case and deeming the appearances filed by the Jenner & Block attorneys withdrawn.

7. Local Rule 2091-1 requires parties to obtain leave of the Court before they may substitute their counsel of record. Local Rule 2091-1.

8. Mr. Stevens is a member in good standing of the bar of this Court. With Mr. Stevens' appearance, there will be no delay or disruption in the continuity of this matter as a result of this substitution of counsel.

WHEREFORE, Jenner & Block LLP and The LCF Group respectfully request that this Court enter an Order, substantially in the form submitted herewith: (a) authorizing LCF to substitute James E. Stevens of Barrick, Switzer, Long, Balsey & Van Evera, LLP as its counsel of record in the Chapter 7 Case; (b) deeming the appearances filed by Ronald R. Peterson, Landon S. Raiford, and William A. Williams of Jenner & Block LLP in the Chapter 7 Case withdrawn; and (c) granting such other relief as may be just.

Dated: September 29, 2021

Respectfully submitted,

**JENNER & BLOCK LLP**

By: /s/ Ronald R. Peterson

Ronald R. Peterson (2188473)  
Landon S. Raiford (6297473)  
William A. Williams (6321738)  
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By: /s/ James E. Stevens

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*Counsel for The LCF Group*